

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

MOHSEN MAHDAWI,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as Acting Boston Field Office Director; Vermont Sub-Office Director of Immigration and Customs Enforcement; TODD M. LYONS, in his official capacity as Acting Director for U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; MARCO RUBIO, in his official capacity as Secretary of State; and PAMELA BONDI, in her official capacity as Attorney General of the United States,

Respondents.

Case No. 2:25-cv-00389

**PETITIONER MOHSEN MAHDAWI'S RULE 30(B)(6) DEPOSITION NOTICE
TO THE DEPARTMENT OF HOMELAND SECURITY**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Petitioner Mohsen Mahdawi, by and through counsel, will take the deposition of the Department of Homeland Security ("DHS"), on _____, 2025, beginning at 9:00 a.m. at Beldock, Levine & Hoffman LLP, 99 Park Avenue, New York, NY 10016 or at such other date, time, and/or location as the parties may agree to. The deposition will be recorded by stenographic and/or audiovisual means.

Pursuant to Rule 30(b)(6), DHS shall designate one or more of its officers, directors, or

managing agents, or other persons who consent to testify on its behalf about the topics set forth in Attachment A. Petitioner requests that DHS provides, in writing, the name(s) of the person(s) who will testify on DHS's behalf concerning the topics, and specify for each such witness the particular topic(s) for which the witness will be prepared to testify on no later than ten (10) days prior to the date of the deposition. Should DHS designate more than one person to testify on its behalf concerning the topics, Petitioner will depose each consecutively.

PLEASE TAKE FURTHER NOTICE that said deposition(s) will take place before an officer authorized by law to administer the oath or affirmation to the witness(es) and will be recorded by audio and visual means. The deposition(s) will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the Federal Rules of Civil Procedure or any other applicable rule or statute. DHS is required to produce the witness(es) at the indicated time and place, unless otherwise agreed upon.

Dated: June 11, 2025
Burlington, Vermont

Respectfully submitted,

/s/ Lia Ernst
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ATTACHMENT A

DEFINITIONS

1. “Petitioner” means Mohsen Mahdawi, whether referenced by name or A-number
2. “Respondents” means Donald Trump, in his official capacity as President of the United States; Patricia Hyde, in her official capacity as Acting Boston Field Office Director; Vermont Sub-Office Director Of Immigration And Customs Enforcement; Todd M. Lyons, in his official capacity as Acting Director For U.S. Immigration And Customs Enforcement; Kristi Noem, in her official capacity as Secretary Of The United States Department Of Homeland Security; Marco Rubio, in his official capacity as Secretary Of State; and Pamela Bondi, in her official capacity as Attorney General Of The United States,
3. “Petition” refers to the Petition for a Writ of Habeas Corpus filed by Petitioner on April 14, 2025 (Dkt. No. 1).
4. “Rubio Memorandum” means the Memorandum for the Secretary of Homeland Security, from Marco Rubio, dated March 15, 2025 (Dkt. No. 42-1).
5. The word “including” means “including, but not limited to.”
6. The terms “and,” “or,” “any,” “all,” and “each” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Interrogatories all information that might otherwise be construed to be outside of their scope.
7. The use of present tense includes past tense, and vice versa.
8. The use of the singular form of any word includes the plural and vice versa.

DEPOSITION TOPICS

1. Your role, position and authority within your organization
2. The organizational and reporting structure of your organization.
3. The decision to punish, target, or retaliate against noncitizens for their speech and

expressive conduct related to Palestine and Israel.

4. The process or method for identifying noncitizens for arrest, detention and/or removal pursuant to the Respondents' practice of punishing, targeting, or retaliating against noncitizens for their speech and expressive conduct related to Palestine and Israel.

5. The investigation, arrest, transfer (or attempted transfer), detention, and attempted removal of Petitioner.

6. The creation, drafting, and issuance of the Rubio Memorandum.

7. The circumstances around Petitioner's naturalization interview on April 14, 2025.

8. Petitioner's "past, current or expected beliefs, statements, or associations" considered by, presented to, or compiled for Secretary of State Rubio in creating, drafting and issuing the Rubio Memorandum.

9. Communications with any foreign governments, foreign government officials, international organizations, non-governmental organizations, or other third-parties regarding Petitioner, Columbia University, student protestors, or 8 U.S.C. § 1227(a)(4)(C).

10. Communications and Actions pursuant to Executive Orders 14188 and 14161.

CERTIFICATE OF SERVICE

I, _____, hereby certify that I caused a true and correct copy of the foregoing
Notice of Deposition to be served on _____2025, by electronic mail on the following:

Michael Drescher
Assistant United States Attorney
District of Vermont
michael.drescher@usdoj.gov

Dated: _____, 2025 /s/ _____